

CIVIL ACTION NO. 3:23-CV-00769-N

**In the United States District Court
Northern District of Texas - Dallas Division**

JEFFREY W. CARPENTER,

Plaintiff,

v.

TWIN CITY FIRE INSURANCE COMPANY,

Defendant.

TWIN CITY FIRE INSURANCE COMPANY'S MOTION FOR PROTECTION

In his second request for production, Carpenter seeks documents that are neither relevant nor proportional to the needs of this case. Twin City files this motion for protection.

Respectfully submitted,

CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, P.C.

By: /s/ Steven J. Knight

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LOCAL COUNSEL FOR TWIN CITY FIRE
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CERTIFICATE OF CONFERENCE

I certify that I conferred with plaintiff's counsel regarding the relief requested herein, and plaintiff's counsel informed me that plaintiff is opposed.

/s/ Steven J. Knight
STEVEN J. KNIGHT

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on all counsel of record via the court's electronic filing system on October 3, 2023.

/s/ Steven J. Knight
STEVEN J. KNIGHT